

**BRUCE A. BLAKEMAN**  
County Executive



**THOMAS A. ADAMS**  
County Attorney

**COUNTY OF NASSAU  
OFFICE OF THE COUNTY ATTORNEY**

August 22, 2025

Hon. Lee G. Dunst  
Magistrate Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Hasper v. County of Nassau et al.*, 2:20-cv-02349(RER)(LGD)

Dear Judge Dunst:


The parties write jointly to provide the Court with an update on the status of discovery since the last report filed on July 23, 2025.

Since that time, the deposition of Defendant Vacchiano has been completed. The only remaining party deposition is that of Defendant William Russell, which the parties agree should be held in abeyance until his cell phone records are obtained from Verizon. The parties have agreed that Plaintiff will submit a proposed "So Ordered" subpoena to Verizon for the Court's review and request a brief additional period to finalize and submit that subpoena.

In the meantime, Plaintiff has identified two non-party witnesses for deposition, and the parties will coordinate dates for those examinations. With the exception of Russell's deposition and the two non-party depositions, discovery is otherwise complete.

We thank the Court for its attention to this matter.

Respectfully submitted,

  
\_\_\_\_\_  
John Carnevale, Esq.  
Deputy County Attorney

**CC:**  
Anthony M. LaPinta, Esq.  
*Attorney for Plaintiff*